

Richard A. Pachulski (CA Bar No. 90073)
PACHULSKI STANG ZIEHL & JONES LLP
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Former Special Reorganization Counsel for
John Jean Bral, Reorganized Debtor

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA - SANTA ANA DIVISION

In re
JOHN JEAN BRAL,
Reorganized Debtor.

Case No. 8:17-bk-10706-ES

Chapter 11

**SUPPLEMENT TO THE POST
CONFIRMATION FINAL APPLICATION
FOR COMPENSATION AND
REIMBURSEMENT OF EXPENSES OF
PACHULSKI STANG ZIEHL & JONES
LLP AS SPECIAL REORGANIZATION
COUNSEL FOR THE DEBTOR FOR THE
PERIOD AUGUST 1, 2019 THROUGH
JANUARY 21, 2021; DECLARATION OF
RICHARD A. PACHULSKI**

(Relates to Docket No. 1084)

Hearing Date and Time:

Date: November 9, 2021
Time: 10:30 a.m.
Place: ZoomGov

Pachulski Stang Ziehl & Jones LLP (“PSZJ” or the “Firm”), former special reorganization counsel to Jon J. Bral (the “Debtor”), hereby submits this Supplement (the “Supplement”) to the *Post Confirmation Final Application for Compensation and Reimbursement of Expenses of Pachulski Stang Ziehl & Jones LLP as Special Reorganization Counsel for the Debtor for the Period*

August 1, 2019 through January 21, 2021 (the “Post Confirmation Fee Application” of
“Application”)¹ filed on October 19, 2021 as docket no. 1084.

This Supplement adopts and incorporates all statements made in the Post Confirmation Fee
Application, as if set forth fully herein.

This Supplement is submitted pursuant to 11 U.S.C. § 330 for the final allowance and
payment to PSZJ in the total amount of \$191,930.74 which represents: (a) professional fees in the
amount of \$190,134.00 and expenses incurred in the amount of \$1,796.74 for the period from
August 1, 2019 through January 21, 2021 (the “Post Confirmation Period”); and (b) \$15,000 in
estimated fees through the date of hearing on this Application, related to the preparation, filing and
notice of the Application and any order thereon, and appearance at any hearing on this matter (the
“Estimated Fees”)².

TABLE I FEES AND EXPENSES						
		Amount Requested		Amount Approved		Total App'd
Fee Period	Dates	Fees	Expenses	Fees	Expenses	
First and Final Fee Application ³	1/1/2018-7/31/2019	\$1,594,301.50	\$31,846.35	\$1,449,411.44	\$31,846.35	\$1,481,357.79
Post-Confirmation Period	8/1/2019-1/21/21	\$190,134.00	\$1,796.74			
Estimated Fees for preparing the Post Confirmation Final Fee Application		\$15,000.00	\$0.00			
Total	8/1/2019-1/21/21	\$205,134.00	\$1,796.74			

¹ Capitalized terms not defined herein shall have the meanings used in the Application.

² As set forth in the attached invoices PSZJ actually incurred more than the \$15,000 estimated fees related to work regarding the Application. However PSZJ is only seeking allowance and payment of \$15,000 related to such work regarding the Application.

³ Pursuant to the *Order on Application for Payment of Final Fees and/or Expenses* (the “Final Fee Order”) entered on December 12, 2019 [Docket. No. 833], the Court awarded PSZJ total fees and expenses in the amount of \$1,481,357.79. The Bankruptcy Court’s order was affirmed by the United States District Court for the Central District of California, Southern Division, by order dated December 1, 2020 [doc. 953].

1 In support of the Estimated Fees, PSZJ hereby attaches as **Exhibit A** the Firm's detailed time
2 records during the Post Confirmation Period related to the preparation, filing and notice of the
3 Application and any order thereon, and any appearance at a hearing on this matter⁴.

4 **Compensation of Professionals**

5 Time billed to this category relates to issues regarding fees of the Firm.

6 During the Post Confirmation Period, the Firm, among other things: (1) reviewed and
7 analyzed pleadings regarding fee application scheduling and deadlines; (2) reviewed and analyzed
8 post-confirmation invoices relating to preparation of the Post Confirmation Fee Application; (3)
9 drafted, and reviewed and revised, the Post Confirmation Fee Application; (4) performed work
10 regarding fee application exhibits; (5) performed work regarding notice and filing of the Post
11 Confirmation Fee Application; (6) performed work regarding an order on such fee application; and
12 (7) corresponded and conferred regarding compensation of professionals issues.

13 Total Hours 43.30/Total Fees \$19,748.00

14 For the reasons set forth above and in the Post Confirmation Fee Application, the Firm
15 respectfully requests that this Court enter an order:

16 1. Allowing on a final basis compensation to the Firm for services rendered in the
17 amount of \$190,134.00 and reimbursement of expenses incurred in the amount of \$1,796.74, for a
18 total amount of \$191,930.74 for the Post Confirmation Period of August 1, 2019, through January
19 21, 2021;

20 2. Allowing on a final basis compensation to the Firm for services rendered in the
21 additional amount of \$15,000.00 through the date of hearing on this Application (or through
22 November 9, 2021 if no hearing is held on this matter), related to the preparation, filing, and notice
23 of the Application and any appearance at a hearing on this matter; and

24 3. Authorizing and directing the Debtor or any successor to pay the Firm the unpaid
25 amounts of all allowed fees and costs; and
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⁴ To date no hearing has been held on the Post Confirmation Fee Application.

1 4. Granting such other and further relief as may be appropriate under the
2 circumstances.

3 Dated: November 19, 2021

PACHULSKI STANG ZIEHL & JONES LLP

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5 By: /s/ Richard A. Pachulski
6 Richard A. Pachulski (CA Bar No. 90073)

7 *Former Special Reorganization Counsel*
8 *for John Jean Bral, Reorganized Debtor*
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DECLARATION OF RICHARD A. PACHULSKI

I, Richard A. Pachulski, declare as follows:

1. I am an attorney at law duly authorized to practice in the State of California and before this Court. I am a partner, in the law firm of Pachulski Stang Ziehl & Jones LLP, former special reorganization counsel to the Debtor.

2. I have personally reviewed the information contained in the Supplement, and the invoice attached to the Supplement for the Post Confirmation Period, and believe such information and invoice to be true and correct to the best of my knowledge, information and belief.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 19th day of November, 2021, at Los Angeles, California.

/s/ Richard A. Pachulski
Richard A. Pachulski

EXHIBIT A

Detailed Time Records of the Firm

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Pachulski Stang Ziehl & Jones LLP

November 17, 2021

Invoice 128921

Client 10601

Matter 00001

WNL

John J. Bral
2601 Main Street ste. 9601
Irvine, CA 92614

RE: Chapter 11

STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 11/17/2021

FEES	\$19,748.00
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TOTAL CURRENT CHARGES	\$19,748.00
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Summary of Services by Professional

<u>ID</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
IDK	Kharasch, Ira D.	Partner	1325.00	0.70	\$927.50
NPL	Lockwood, Nancy P. F.	Paralegal	250.00	30.10	\$7,525.00
RMP	Pachulski, Richard M.	Partner	1595.00	0.90	\$1,435.50
WLR	Ramseyer, William L.	Counsel	850.00	11.60	\$9,860.00
				<hr/> 43.30	<hr/> \$19,748.00

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Summary of Services by Task Code

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
CP	Compensation Prof. [B160]	43.30	\$19,748.00
		43.30	<hr/> \$19,748.00

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Summary of Expenses

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Compensation Prof. [B160]						
09/23/2021	NPL	CP	Email communications with J. O'Keefe regarding fee applications pursuant to effective date.	0.20	250.00	\$50.00
09/23/2021	NPL	CP	Email communications with R. Pachulski regarding dates and deadlines associated with effective date and firm fee application.	0.40	250.00	\$100.00
09/23/2021	NPL	CP	Attention to dates and deadlines associate with fee applications for all professionals.	0.10	250.00	\$25.00
09/23/2021	NPL	CP	Review PSZJ post confirmation invoices.	0.40	250.00	\$100.00
09/23/2021	NPL	CP	Review order confirming plan and notice of effective date.	0.10	250.00	\$25.00
09/24/2021	NPL	CP	Telephone call with J. O'Keefe regarding professionals fee applications.	0.20	250.00	\$50.00
09/28/2021	IDK	CP	Office conference and E-mails with R Pachulski, N Lockwood re fee app and payment issues	0.40	1325.00	\$530.00
09/28/2021	RMP	CP	Review Bral bills.	0.90	1595.00	\$1,435.50
09/28/2021	NPL	CP	Email communications with J. Dulberg regarding PSZJ fee application through effective date.	0.10	250.00	\$25.00
09/28/2021	NPL	CP	Email communications with W. Ramseyer regarding PSZJ fee application through effective date.	0.10	250.00	\$25.00
09/28/2021	NPL	CP	Email communications with R. Pachulski regarding PSZJ fee application through effective date.	0.30	250.00	\$75.00
09/28/2021	NPL	CP	Professional fee analysis for fees and costs incurred by PSZJ from date of confirmation through effective date of the plan.	2.50	250.00	\$625.00
09/28/2021	NPL	CP	Begin preparation of post confirmation fee application for PSZJ.	1.40	250.00	\$350.00
09/29/2021	NPL	CP	Email communications with L. Gardiazabal regarding pending and final invoices for PSZJ fee application period.	0.30	250.00	\$75.00
09/29/2021	NPL	CP	Continued preparation of PSZJ fee application from date of confirmation through effective date.	2.20	250.00	\$550.00
09/29/2021	NPL	CP	Set up and begin preparation of exhibits to PSZJ fee application.	1.80	250.00	\$450.00
09/30/2021	NPL	CP	Edits to PSZJ post confirmation fee application.	1.10	250.00	\$275.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/01/2021	NPL	CP	Email communications with B. Anavim regarding dates and deadlines associated with PSZJ post confirmation fee application.	0.20	250.00	\$50.00
10/04/2021	NPL	CP	Continued preparation of PSZJ fee application and corresponding exhibits.	3.80	250.00	\$950.00
10/05/2021	NPL	CP	Draft email to W. Ramseyer regarding notes and comments to PSZJ final fee application.	0.50	250.00	\$125.00
10/05/2021	NPL	CP	Further edits to PSZJ final fee application.	0.80	250.00	\$200.00
10/07/2021	WLR	CP	Draft 2nd final fee application	2.40	850.00	\$2,040.00
10/08/2021	WLR	CP	Draft 2nd final fee application	2.00	850.00	\$1,700.00
10/10/2021	WLR	CP	Draft 2nd final fee application	3.90	850.00	\$3,315.00
10/11/2021	NPL	CP	Email communications with W. Ramseyer regarding PSZJ post confirmation fee application.	0.10	250.00	\$25.00
10/13/2021	WLR	CP	Prepare final fee application	0.30	850.00	\$255.00
10/13/2021	WLR	CP	Review effective date notice	0.20	850.00	\$170.00
10/13/2021	WLR	CP	Draft final fee application	0.40	850.00	\$340.00
10/13/2021	WLR	CP	Review and revise post-confirmation final fee application	1.50	850.00	\$1,275.00
10/13/2021	NPL	CP	Email communications with L. Gardiazabal and W. Ramseyer regarding final invoice for January 2021.	0.10	250.00	\$25.00
10/13/2021	NPL	CP	Edits to PSZJ post confirmation fee application.	1.30	250.00	\$325.00
10/13/2021	NPL	CP	Conduct fee calculation analysis.	0.60	250.00	\$150.00
10/13/2021	NPL	CP	Continued preparation of exhibits to PSZJ post confirmation fee application.	0.70	250.00	\$175.00
10/13/2021	NPL	CP	Analysis of professional fees by task code.	0.60	250.00	\$150.00
10/14/2021	NPL	CP	Continued preparation of exhibits to post confirmation fee application for PSZJ.	3.20	250.00	\$800.00
10/15/2021	IDK	CP	E-mails re Bral billing and fee apps	0.30	1325.00	\$397.50
10/15/2021	NPL	CP	Further edits to PSZJ post confirmation fee application.	0.70	250.00	\$175.00
10/15/2021	NPL	CP	Complete and compile exhibits to PSZJ post confirmation fee application.	1.80	250.00	\$450.00
10/15/2021	NPL	CP	Draft email to R. Pachulski regarding PSZJ post	0.10	250.00	\$25.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			confirmation fee application.			
10/15/2021	NPL	CP	Email communication with L. Gauthier regarding PSZJ post confirmation fee application.	0.20	250.00	\$50.00
10/16/2021	WLR	CP	Review and revise final fee application (.3), review exhibits (.3), correspondence to Nancy Lockwood re changes (.3)	0.90	850.00	\$765.00
10/18/2021	NPL	CP	Prepare comments of the reorganized debtor to PSZJ post confirmation fee application.	0.30	250.00	\$75.00
10/18/2021	NPL	CP	Review emails from R. Pachulski regarding edits to PSZJ post confirmation final fee application.	0.10	250.00	\$25.00
10/19/2021	NPL	CP	Draft email to J. Bral regarding PSZJ post confirmation final fee application.	0.10	250.00	\$25.00
10/19/2021	NPL	CP	Email communications with L. Gauthier regarding PSZJ post confirmation fee application.	0.10	250.00	\$25.00
10/19/2021	NPL	CP	Prepare service list for PSZJ post confirmation final fee application.	0.30	250.00	\$75.00
10/19/2021	NPL	CP	Email communications with M. Hauser regarding PSZJ post confirmation final fee application.	0.10	250.00	\$25.00
10/19/2021	NPL	CP	Email communications with R. Pachulski regarding PSZJ post confirmation final fee application.	0.10	250.00	\$25.00
10/19/2021	NPL	CP	Attention to dates and deadlines related to PSZJ post confirmation final fee application.	0.10	250.00	\$25.00
10/19/2021	NPL	CP	Finalize and compile exhibits to PSZJ post confirmation final fee application.	1.50	250.00	\$375.00
10/19/2021	NPL	CP	Final edits to PSZJ post confirmation final fee application.	0.30	250.00	\$75.00
11/04/2021	NPL	CP	Email communications with J. Bral regarding declaration in support of PSZJ post confirmation fee application; revise and finalize same.	0.30	250.00	\$75.00
11/04/2021	NPL	CP	Email communications with L. Gauthier regarding declaration of J. Bral in support of PSZJ post confirmation fee application.	0.20	250.00	\$50.00
11/08/2021	NPL	CP	Draft emails to R. Pachulski regarding order granting PSZJ fees pursuant to post confirmation fee application.	0.20	250.00	\$50.00
11/08/2021	NPL	CP	Review tentative ruling regarding post confirmation fee applications of all estate professionals.	0.20	250.00	\$50.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
11/08/2021	NPL	CP	Email communications with L. Gauthier regarding order granting fees for estate professionals.	0.20	250.00	\$50.00
11/10/2021	NPL	CP	Draft email to R. Pachulski regarding order granting PSZJ fees pursuant to post confirmation fee application.	0.10	250.00	\$25.00
				43.30		\$19,748.00
TOTAL SERVICES FOR THIS MATTER:						\$19,748.00

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

Pachulski Stang Ziehl & Jones LLP, 10100 Santa Monica Blvd., 13th Floor, Los Angeles, CA 90067

A true and correct copy of the document entitled:

SUPPLEMENT TO THE POST CONFIRMATION FINAL APPLICATION FOR COMPENSATION AND REIMBURSEMENT OF EXPENSES OF PACHULSKI STANG ZIEHL & JONES LLP AS SPECIAL REORGANIZATION COUNSEL FOR THE DEBTOR FOR THE PERIOD AUGUST 1, 2019 THROUGH JANUARY 21, 2021; DECLARATION OF RICHARD A. PACHULSKI

will be served as set forth below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (date) 11/19/2021, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL: On (date), 11/19/2021 I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

11/19/2021
Date

Nancy Lockwood
Printed Name

/s/ Nancy Lockwood
Signature

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):**

- **Shane M Biornstad** SBiornstad@shulmanbastian.com, agarcia@shulmanbastian.com
- **Greg P Campbell** ch11ecf@aldridgepite.com, gc@ecf.inforuptcy.com;gcampbell@aldridgepite.com
- **Thomas H Casey** kdriggers@tomcaseylaw.com, msilva@tomcaseylaw.com
- **David Choi** dchoi@goldbergsegalla.com, david@jdmrllp.com;rmendoza@goldbergsegalla.com;jcohen@goldbergsegalla.com
- **Alan J Friedman** afriedman@shulmanbastian.com, lgauthier@shulmanbastian.com
- **Daniel K Fujimoto** wdk@wolffirm.com
- **Beth Gaschen** bgaschen@wglp.com, kadele@wglp.com;cbmeeker@gmail.com;cyoshonis@wglp.com;lbracken@wglp.com;bgaschen@ecf.courtdrive.com;gestrada@wglp.com
- **Michael J Hauser** michael.hauser@usdoj.gov
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- **Gary E Klausner** gek@lnbyg.com
- **William N Lobel** wlobel@tocounsel.com, jokeefe@tocounsel.com;sschuster@tocounsel.com
- **Bonni S Mantovani** bmantovani@pralc.com, ecfcc@ecf.courtdrive.com
- **William F McDonald** wfmcdonald@gmail.com
- **Krikor J Meshefejian** kjm@lnbyg.com
- **Richard M Pachulski** rpachulski@pszlaw.com
- **Dipika Parmar** dipika.parmar@aissolution.com
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- **Lee S Raphael** ecfcc@ecf.courtdrive.com, ecfcc@ecf.courtdrive.com
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- **Edward G Schloss** egs2@ix.netcom.com
- **Valerie Smith** claims@recoverycorp.com
- **Daniel B Spitzer** dspitzer@spitzeresq.com
- **United States Trustee (SA)** ustpregion16.sa.ecf@usdoj.gov
- **Zann R Welch** ecfnofices@ascensioncapitalgroup.com
- **Alan Steven Wolf** wdk@wolffirm.com
- **Dean A Ziehl** dziehl@pszlaw.com, dziehl@pszlaw.com

2. **SERVED BY UNITES STATES MAIL**

John Jean Bral
64 Sandpiper
Irvine, CA 92604